

# Committee on Measures of Student Success

## Draft Report

September 2, 2011

**FOR DISCUSSION ONLY**

## Table of Contents

Executive Summary .....	2
Introduction.....	4
Guiding Principles .....	7
Findings and Recommendations .....	9
Broaden the Coverage of Student Graduation Data to Reflect the Diverse Student Populations at Two-Year Colleges .....	10
Improve the Collection of Student Progression and Completion Data.....	13
Improve Technical Guidance Available to Institutions in Meeting Statutory Disclosure Requirements.....	16
Encourage Colleges to Disclose Comparable Data on Measures of Student Learning and Employment Outcomes .....	18
Improve Coordination of Data Related to Student Success .....	20
Conclusion .....	22

## Executive Summary

*[Content is forthcoming and will be included in the final report.]*

## Introduction

President Obama has articulated a goal for the United States to lead the world in the proportion of adults with a postsecondary credential by 2020. Over the past decade student enrollment at two-year colleges has increased by 26 percent from 5.9 million to 7.5 million undergraduate students.<sup>1</sup> Recognizing the importance of the two-year sector in meeting these goals, the President called for 5 million more community college graduates by the year 2020.<sup>2</sup> To achieve these ambitious goals, policymakers and others need more—and better—data on student progression and completion at two-year colleges.

Under the Student Right to Know and Campus Security Act of 1990 institutions must disclose, or make available, to current and prospective students the rate at which full-time, first-time degree- or certificate-seeking students complete their academic programs. To help institutions comply with this disclosure requirement, the National Center for Education Statistics (NCES) at the U.S. Department of Education created the Graduation Rate Survey (GRS) within the Integrated Postsecondary Education Data System (IPEDS) where institutions report on cohorts of full-time, first-time degree- or certificate-seeking students and the numbers of students in the cohort who complete within 100, 150, and 200 percent of the normal time required. Approximately 57 percent of full-time, first-time students at four-year institutions completed a bachelor's degree within six years of beginning their studies.<sup>3</sup> At two-year institutions, about 37 percent of full-time, first-time students received a degree or certificate within four years of beginning their studies.<sup>4</sup> These figures are often cited by policymakers to assess the performance of two-year colleges and to determine funding levels for these colleges or allocate resources within state or local budgets. While the graduation rates reported through IPEDS provide important and comparable graduation rate data across institutional sectors, they do not fully convey student success at two-year institutions.

Two-year institutions serve a diverse set of students—students seeking to learn new skills and not pursue a degree, students working toward an occupationally focused certificate, students who plan to earn an associate's degree, and students who plan to earn credits and transfer to a four-year institution. Moreover, many students at two-year colleges enroll in college on a part-time

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<sup>1</sup> U.S. Department of Education, National Center for Education Statistics, *Condition of Education 2011*, Table A-8-2. Retrieved from <http://nces.ed.gov/programs/coe/tables/table-hep-2.asp>.

<sup>2</sup> Remarks by President Obama at the White House Summit on Community Colleges held October 5, 2010. Retrieved from [http://www.whitehouse.gov/sites/default/files/uploads/community\\_college\\_summit\\_report.pdf](http://www.whitehouse.gov/sites/default/files/uploads/community_college_summit_report.pdf).

<sup>3</sup> Knapp, L.G., Kelly-Reid, J.E., and Ginder, S.A. (2010). *Enrollment in Postsecondary Institutions, Fall 2008; Graduation Rates, 2002 & 2005 Cohorts; and Financial Statistics, Fiscal Year 2008* (NCES 2010-152). U.S. Department of Education. Washington, DC: NCES. Retrieved from <http://nces.ed.gov/pubs2010/2010152rev.pdf>.

<sup>4</sup> Knapp, Kelly-Reid, and Ginder (2010).

basis, which can also affect their progress towards graduation. For example, in the Fall of 2009, about 57 percent of students enrolled at a two-year college were enrolled part-time compared with just 27 percent of students at four-year institutions.<sup>5</sup> Moreover, community colleges also enroll large numbers of students taking non-credit course work that lead to specific workforce or industry credentials or are offered as contract training for specific employers. Varying student characteristics and varying student motivations for attending two-year institutions underscore the need for federal measures of student success to take into account the multiple outcomes characteristic to this sector of higher education.

To improve information on student outcomes at two-year colleges, state policymakers and institutions have launched voluntary efforts to collect and disclose more student success data across two-year institutions. The American Association of Community College's Voluntary Framework of Accountability is a collaborative effort among community colleges to design alternative success measures for two-year institutions for use by policymakers and other organizations. By 2012, the effort aims to have institutions measure outcomes related to (1) student progress and persistence; (2) workforce, economic, and community development; and (3) student learning. Some of the proposed measures include assessing student progress in reaching a defined threshold of earned credits, the percentage of graduates that passed licensure examinations, or the wage growth of graduates.<sup>6</sup> In addition, the Complete College America initiative has developed completion, efficiency, and effectiveness indicators to be used by states to measure student success at all postsecondary institutions. Some of the proposed measures include reporting the progress of remedial students in completing remedial coursework and subsequently completing a college level course in the same subject and the average length of time it takes students to complete a degree.<sup>7</sup> Similarly, the National Governors Association's Complete to Compete initiative has made recommendations on common college completion metrics that states should collect and report publicly.<sup>8</sup> Finally, accrediting agencies have also taken steps to increase focus on student outcomes, especially learning outcomes, for institutional accountability.

During this time of increased interest in improving measures of student success, the U.S. Department of Education's Committee on Measures of Student Success was authorized by the Higher Education Opportunity Act of 2008 (HEOA) to advise the Secretary of Education in assisting two-year degree-granting institutions of higher education in meeting federal requirements to disclose graduation and completion rates and to explore whether there are alternative measures for capturing student success at two-year institutions.

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<sup>5</sup> Analysis of data reported in the U.S. Department of Education, *Digest of Education Statistics 2010*, Table 202, retrieved from [http://nces.ed.gov/programs/digest/d10/tables/dt10\\_202.asp](http://nces.ed.gov/programs/digest/d10/tables/dt10_202.asp).

<sup>6</sup> Information about the VFA is available at <http://aacc.nche.edu/Resources/aaccprograms/vfa/Pages/default.aspx>.

<sup>7</sup> Information about Complete College America is available at <http://www.completecollege.org>.

<sup>8</sup> Information about Complete to Compete is available at <http://www.subnet.nga.org/ci/1011>.

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Specifically the Committee:

- Will develop recommendations for the Secretary of Education regarding the accurate calculation and reporting of completion or graduation rates of entering certificate- or degree-seeking, full-time, undergraduate students by two-year degree-granting institutions of higher education.
- May also recommend additional or alternative measures of student success that are comparable alternatives to the completion or graduation rates of entering degree-seeking full-time undergraduate students, taking into account the mission and role of two-year degree-granting higher education institutions.

This report summarizes the Committee's discussions during its public meetings and provides recommendations to the Secretary. The report begins with a discussion of principles the Committee used to guide its discussions of the key issues and considerations as it developed recommendations. The Committee looked at ways to recommend changes within the Department's current framework of calculating graduation rates and examined the broader idea of student success and capturing information that would be useful to not only students and their families but also policymakers. The following sections list the specific recommendations of the Committee and provide some context and understanding of how the recommendations will improve data collected to measure student success and will better inform policy conversations related to two-year institutions.

## Guiding Principles

The Committee recognized that reframing the conversation about measuring student progress and success at two-year institutions would present challenges. There would need to be a balance between competing priorities and needs. As a result, the Committee developed guiding principles in considering possible solutions.

Since two-year institutions have many missions—providing access to college for all students and a pathway to a four-year degree, while also meeting the workforce needs of employers and providing training to those already employed or looking for employment—the Committee acknowledged the need for multiple outcomes to measure an institution’s success. Building and improving upon graduation rate data already reported by colleges, as well as developing new and alternative methods to measuring student success, requires a balance between meeting the information needs of students and colleges with the accountability demands of policymakers. A student who is trying to choose a college needs and evaluates information in a different manner than a policymaker who is making funding or policy decisions.

Although each group’s needs may differ, there are areas where they converge. For example, some measures, such as graduation or transfer rates, are important for students to know their likelihood of graduation or transfer at an institution, just as they are important to policymakers for assessing whether colleges adequately prepare students to complete a degree or program. For all audiences, having comparable data about student success is important, and there are many ways to compare measures: at a national or regional level, at an institutional or program level, or based on student characteristics.

### *Guiding Principles*

- **Multiple missions:** Two-year institutions have multiple, broad missions that serve diverse student populations.
- **Multiple outcomes:** Given two-year institutions’ broad missions, multiple outcome measures should be used to document student success.
- **Transparency:** Students, families, policymakers, and researchers need more and better information about postsecondary student success.
- **Comparability:** Although the strength of America’s higher education institutions is its diversity, certain data about student success should be disclosed or reported in a way that allows consumers to compare institutions.
- **Costs and benefits:** Increased transparency and consumer information should be weighed against the costs institutions would incur to disclose or report the data.
- **Federal role:** Recommendations should include actions that take advantage of the unique role that the federal government can play.
- **Feasibility:** Recommendations should include actions that can be implemented readily with the Department’s current statutory or regulatory authority.
- **Inclusion:** Data on student success measures should be reported such that students, families, policymakers, and researchers have more information about populations that have traditionally been underrepresented.
- **Forward thinking:** Recommendations should also include actions that may be challenging to implement but that would be important to inform the national conversations about student success in both the short-term and the long-term.

## **DRAFT FOR DISCUSSION ONLY**

Measures of student success need to more accurately reflect the comprehensive mission of two-year institutions and the diversity of students that these institutions serve. For example, current graduation rates do not adequately reflect these institutions' multiple missions and diverse populations; thus, new data could be collected and disseminated to address these deficiencies. The Committee also recognized the importance of building on current voluntary efforts to collect or disclose data from two-year colleges on alternative measures of student success such as student learning or employment outcomes. Because many of these initiatives are collecting data using different metrics and for different student groups, there is a role for the federal government in improving the transparency, quality, and comparability of the data.

Finally, although additional or alternative measures may be important to capture more comprehensive data about student success at two-year institutions, the need for more information must be balanced by an understanding of the potential administrative and financial burdens collecting such data may place on institutions. Alternative measures of success should be beneficial to colleges by enabling them to better convey the outcomes experienced by their students.

## Findings and Recommendations

Using these guiding principles, the Committee makes recommendations where the U.S. Department of Education can implement change under its current statutory and regulatory authority, influence actions and efforts underway, and provide direction on future work that needs to be done to further inform the conversation around student success.

- Recognizing the value in current graduation rates being reported by colleges to the federal government and that these are the primary source of such data for all institutions in American higher education, the Committee recommends that Department take actions to improve the comprehensiveness of the graduation rate data collected through IPEDS and provide additional technical assistance to help institutions meet statutory disclosure requirements around student success.
- Building on efforts to provide more information on what students are learning while in college and students' post-college employment success, the Committee recommends that the Department encourage institutions to voluntarily collect, disclose, and report results of measures of student learning and student employment after college, including but not limited to those already being reported to accrediting agencies, state higher education agencies, or voluntary accountability initiatives.
- To further inform the conversations about student success at two-year colleges, the Department should take steps to encourage actions by states, colleges, and the higher education community to develop more robust data systems that allow for collection and dissemination of a wider range of outcome measures for two-year institutions and to shine the light on promising practices in the collection and dissemination of data related to student success at two-year institutions.

Some of these recommendations the Department and the higher education community can implement now to improve student success data for two-year institutions. However, the Committee also recognizes that some recommendations would require statutory or regulatory changes or greater investment in cross-state and cross-agency efforts that may not be feasible given the current budgetary climate. The Committee believes that such changes are necessary to ensure that institutions have access to and are able to report data that more accurately describe student success at two-year institutions in the long-term.

## Broaden the Coverage of Student Graduation Data to Reflect the Diverse Student Populations at Two-Year Colleges

### *Findings*

Institutions currently disclose and report through the Graduation Rate Survey (GRS) in IPEDS a graduation rate defined by the Student Right to Know and Campus Security Act of 1990 (SRK). That graduation rate applies only to full-time, first-time degree- or certificate-seeking students and measures student completion of a degree or program over several time periods. The graduation rate measure as currently implemented in IPEDS was developed 20 years ago and represented a consensus among institutions, higher education associations, and U.S. Department of Education officials about the importance of having comparable graduation rates across all sectors. As a result, institutions report the data in the same manner, providing a consistent, reliable, and valid measure. These graduation rates were also developed to be simple enough for consumers to understand.

The limitations of the current graduation rate defined by SRK are well-documented.<sup>9</sup> The graduation rate measures outcomes only of full-time, first-time degree- or certificate-seeking students, which represent a minority of students enrolled at most two-year institutions. At two-year institutions part-time students typically comprise more than half of all students.<sup>10</sup> Second, most two-year colleges have open admission policies allowing students of varying levels of academic preparation to enroll in college. As a result, many students are not fully prepared for college-level coursework and must take developmental or remedial courses in reading, math, and writing. In 2007-08, about 42 percent of first-year undergraduates at public two-year colleges reported ever taking a remedial course at some point.<sup>11</sup> Due to variations in state policies on identifying students and requiring them to enroll in remedial education, the actual percentage of students needing remediation may be higher at two-year colleges. Students that do enroll in remedial education are often enrolled in a sequence of remedial courses that results in the student needing to pass one, two, or even three courses before taking a college-level course. Graduation rates for students enrolled in remedial education are much lower than students that do not take remedial coursework. Research analyzing data from the National Education Longitudinal Study found that less than 25 percent of community college students that took a remedial course

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<sup>9</sup> Cook, B. and Pullaro, N. (2010). *College Graduation Rates: Behind the Numbers*. Washington, DC: American Council on Education.

<sup>10</sup> U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS), Spring 2010, Enrollment component.

<sup>11</sup> U.S. Department of Education, National Center for Education Statistics, 2007–08 National Postsecondary Student Aid Study (NPSAS:08), Table A-22-1.

completed a degree or certificate within eight years of enrolling.<sup>12</sup> In comparison, about 40 percent of community college students that did not take remedial coursework graduated within eight years. Current graduation rates collected in IPEDS do not have information on the number of remedial students that are included in the cohort.

Over the last two years NCES has undertaken efforts to improve collection and reporting of graduation rate data. For example, in 2010, a working group of the National Postsecondary Education Cooperative (NPEC) issued several recommendations designed to reduce the confusion and complexity surrounding reporting graduation rate data.<sup>13</sup> Specifically, the group recommended that NCES (1) clarify instructions and definitions associated with the IPEDS GRS component, and (2) use IPEDS training to share best practices for creating cohorts; identifying and counting students to exclude from the cohort; and identifying completers. Although these actions are positive developments, they have not addressed the limitations of the current graduation rates for two-year colleges. The Committee has identified ways that the Department could address these limitations within its statutory and regulatory authority by augmenting existing IPEDS surveys.

### *Recommendations*

**The Committee recommends that the Department enhance graduation rate reporting in IPEDS to include information about part-time students and students who enroll in remedial coursework.**

#### **1. The Department should add a part-time, degree-seeking cohort in IPEDS.**

Two-year colleges should report in IPEDS graduation rates for beginning part-time students—who are currently excluded from current graduation rates. It is important to include this group in measures of graduation and transfer; yet, colleges would need additional guidance on how best to identify part-time students who are degree-seeking, and alternative timeframes for measuring graduation or transfer might need to be considered. The fluid pattern of student enrollment and students' own uncertainty about their educational goals can make identifying a degree-seeking student challenging for colleges. The Department should provide additional guidance on identifying students that intend to complete a degree and therefore should be included in the graduation rate cohort.

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<sup>12</sup> Bailey, T. (2008). *Challenge and Opportunity: Rethinking the Role and Function of Developmental Education in Community College*. New York: Community College Research Center.

<sup>13</sup> The National Postsecondary Education Cooperative was established by NCES to promote the quality, comparability, and utility of postsecondary data and information that support policy development at the federal, state, and institution levels. The report on suggested improvements to graduation rates is available at <http://nces.ed.gov/pubs2010/2010832.pdf>.

## DRAFT FOR DISCUSSION ONLY

The Department should convene technical experts to consider the best methods for adding a part-time, degree-seeking cohort. The panel of technical experts should consider the following in its discussions:

- What is a degree-seeking student?
- Which of the following, if any, could be used to better define degree-seeking status than what is currently used in IPEDS?
  - For example, intent could be established based on students' collective course-taking patterns over the entire history of their enrollment. Students could be considered degree-seeking if they ever, during their entire academic history at the reporting institution:
    - Received any type of federal financial aid, regardless of what courses they took at any time; or any state or locally-based financial aid whose requirement for eligibility is that the student be enrolled in a degree, certificate, or transfer-seeking program; or
    - Ever attempted, at any point in their entire academic history, any degree-applicable, transferrable, or remedial math or English course (not including ESL); or
    - Ever attempted any course that is identified as being in an advanced vocational, occupational, or apprenticeship sequence that leads directly to a credit degree or certificate; or
    - Were identified by the local institution as being clearly enrolled in a program or sequence that leads to a degree, certificate, or transfer to a four-year institution (such as being officially enrolled in or having declared to be in a particular program or major after having received matriculation or advisement services).
  - For example, would the 100 and 150 percent tracking periods defined by SRK be adequate, or should the new 200 percent tracking period required in HEOA be more appropriate for tracking part-time students? The Committee encourages NCES to use its sample survey data to help experts determine a time-to-degree that would capture graduates at the appropriate timeframes without imposing too large a burden on institutions for tracking many different cohorts over many different timeframes.
- What is the appropriate tracking period for part-time cohorts?

**2. The Department should distinguish between remedial and non-remedial students in IPEDS graduation rates.**

Students that enroll in remedial coursework are not currently identified separately in the graduation rate cohorts reported in IPEDS. The Department should determine a way to delineate between remedial and non-remedial students. There currently exists some guidance in IPEDS defining remedial coursework. However, given the differences across institutions in how students are identified and placed in remedial courses, additional guidance is necessary. Although it may be challenging for some colleges to collect detailed information on remedial students and their progress over time, data on their progression and completion would provide insights into how institutions support students of varying level of academic preparedness, better informing K–12 and postsecondary policy conversations at the local, state, and federal levels. The Department should convene technical experts to consider the best method for identifying students enrolled in remedial coursework for the purposes of IPEDS reporting.

## Improve the Collection of Student Progression and Completion Data

### *Findings*

Given the characteristics of students at two-year colleges and the mission of many two-year colleges to prepare students for transfer, the current transfer and graduation rates collected in IPEDS do not provide a complete picture of student success at these institutions. For example, students at two-year institutions often work or have family commitments they must balance with their educational programs. Thus, while it may take these students more time to complete their program or degree, there is no opportunity to report in IPEDS the percentage of students in the graduation rate cohort that were still enrolled at the institution beyond the statutorily defined tracking period.

For many two-year institutions preparing students for transfer to a four-year institution is an equally positive outcome as a student earning an associate's degree. However, the current method for reporting on students who transfer out does not allow institutions to calculate a total transfer and graduation rate. In IPEDS, institutions whose mission includes preparing students for transfer report a “transfer-out” rate that measures the percentage of students that transfer separate from the graduation rate. Not all institutions are required to report on students who transfer out. Per the Higher Education Amendments of 1998 (Public Law 105-244), institutions for which the substantial preparation of students for transfer to another institution is part of their

## DRAFT FOR DISCUSSION ONLY

mission are required to report the number of students who transfer out. Institutions that do not have substantial preparation for transfer as part of their mission have the option to report such students. However, there is no clear definition of what constitutes “substantial preparation for transfer,” leaving institutions to decide for themselves whether this is part of their mission. Further complicating the calculations of transfer-out and graduation rates, under current regulations institutions may include in their graduation rate cohort a student who successfully completed a transfer preparation program even if he or she did not receive an actual degree.

To be able to determine if a student has transferred, institutions need data on student enrollment at other institutions, particularly for students that cross state lines to transfer. Institutions typically use four data sources to help them report on transfers out: (1) state student unit record databases; (2) system student unit record databases; (3) the National Student Clearinghouse; and (4) institutional surveys, exit interviews, and administrative records. However, institutional capacity to access or use these data sources varies greatly. As a result, transfers-out have been significantly underreported by institutions.<sup>14</sup>

For two-year colleges, transfer to a four-year institution or preparing a student for transfer are both positive outcomes, yet there is no way to know using federal data the rate at which students in the IPEDS graduation rate cohort achieve those outcomes at two-year institutions. There is a need to improve the way data on students who transfer out are reported in IPEDS and improve institutions’ access to student enrollment data across institutions and states.

The Committee notes that a potential solution for addressing issues around the availability of data for transfer students is a national, privacy-protected student unit record system that includes all institutions that participate in federal student financial aid programs (such as private institutions) and that will cover student enrollment in all states. Such a system would decrease institutional burden associated with reporting to IPEDS and increase the U.S. Department of Education’s ability to report more and better data on student progression, transfer, and success. However, the creation of such a system is currently prohibited by the HEOA. In the absence of statutory changes authorizing the development of a national student unit record system, the Department should strengthen institutional reporting of students who transfer out by clarifying IPEDS definitions and encouraging interstate connections between state data systems.

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<sup>14</sup> Medwick, J.A. (2009). *Transfer-out Reporting on the IPEDS Graduation Rate Survey: A First Look at Trends and Methods*. Tallahassee, FL: Association for Institutional Research and U.S. Department of Education, NCES.

## **DRAFT FOR DISCUSSION ONLY**

### ***Recommendations:***

**The Committee recommends that the Department broaden student progression and completion measures collected in IPEDS. The Committee also recommends that the Department strengthen current institutional reporting of data on students who transfer out in IPEDS.**

- 1. The Department should have institutions report in IPEDS more inclusive student progression and graduation measures by**
  - a. Creating a reporting element that combines the following outcomes: “lateral transfers to two-year or less than two-year institutions” and “still enrolled at your institution in the term immediately after the tracking period”;**
  - b. Allowing for independent and discrete reporting of outcomes for awards and transfers; and**
  - c. Creating a reporting category that unduplicates the counts of higher-order outcomes for two-year institutions, such as receipt of a degree/certificate; substantial preparation for transfer; or transfer to a four-year institution**

At least one of the graduation rate components in IPEDS, preferably the Graduation Rates 200 (GR200) component, should be used to collect data on more comprehensive measures of student outcomes including graduation and transfer. The IPEDS GR200 component was developed to collect additional graduation rate data required in the HEOA, collecting graduation rates at 200 percent of normal time to completion for full-time, first-time, degree- or certificate-seeking undergraduates. In addition to broadening the coverage of student graduation data to include part-time students, the Department should develop a measure that counts not only those students that receive a degree or certificate, but also those that transfer laterally, those that transfer to four-year institutions, those that were substantially prepared for transfer, or those that were still enrolled at the institution.

- 2. The Department should clarify definitions used in IPEDS to allow institutions to report more precisely students who transfer out.**

The Department should define what counts as “substantial preparation for transfer” to another institution. The Department should also clarify the IPEDS definition of what constitutes a transfer student for reporting purposes.

**3. The Department should encourage linkages between state data systems to strengthen institutions' capacity to report data on students who transfer.**

The Department should take steps to strengthen institutions' reporting of data on students that transfer by encouraging linkages between state data systems. Many states have systems in place that can link student data across institutions; however students may transfer to schools in different states. Particularly in metropolitan areas that cover multiple states, the ability to create such linkages would greatly improve institutions' ability to determine whether a student transferred or not.

## **Improve Technical Guidance Available to Institutions in Meeting Statutory Disclosure Requirements**

### ***Findings***

Disclosure of graduation rates of entering certificate- or degree-seeking, full-time, undergraduate students by two-year degree-granting institutions is only one of a number of disclosures required by HEOA. Disclosure requirements, which are often different from reporting requirements, are information that institutions are required to make available to students, parents, or other groups.<sup>15</sup> There are about 40 disclosures that postsecondary institutions must comply with under federal law. The disclosures range from providing information on campus crime to ensuring that students have received and understand their borrowing rights. In addition, some disclosure requirements must be “made available to students,” while others must be provided to students. Being able to navigate the many layers of requirements can pose challenges to institutions. The Department plays a critical role in helping institutions meet statutory disclosure requirements by providing technical assistance on how they can calculate and disseminate the required data.

The Department has already developed vehicles for providing such technical assistance. For example, the Department's Privacy and Technical Assistance Center was established as a “one-stop” resource for education stakeholders to learn about data privacy, confidentiality, and security practices related to student-level longitudinal data systems. In addition, the Department has released a template that institutions can use voluntarily to meet a specific disclosure requirement. The Department's net price calculator template, released in 2009, is a template that

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<sup>15</sup> A summary of disclosure requirements in the HEA (as amended by the HEOA) is available in *Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination (Updated)*. (NPEC 2010-831v2). (2009). Washington, DC: National Postsecondary Education Cooperative.

## DRAFT FOR DISCUSSION ONLY

institutions can use voluntarily to help them comply with the disclosure requirement in the HEOA that institutions have a net price calculator on their websites for full-time, first-time undergraduate students. Promoting the voluntary use of disclosure templates developed by the Department could improve the quality of the data and also decrease institutional burden associated with disclosures.

### *Recommendations:*

**The Committee recommends that the Department provide increased technical assistance to institutions to help them meet statutory disclosure requirements.**

**1. The Department should provide additional technical guidance to institutions regarding disclosures and student privacy.**

Under the HEOA, institutions must disaggregate completion or graduation rates by:

- Students who received a Pell grant;
- Students who received a FFEL loan (except for unsubsidized Stafford loans) but did not receive a Pell grant; and
- Students who did not receive a Pell grant or a FFEL loan.

The Department has drafted technical guidance to colleges on how to disclose such data while protecting student privacy. The Department should widely distribute that guidance and develop other materials through its Privacy and Technical Assistance Center as necessary.

**2. With input from technical experts and institutional representatives, the Department should continue to develop templates that institutions could voluntarily adopt to decrease institutional burden associated with meeting federal disclosure requirements.**

A working group of the National Postsecondary Education Cooperative (NPEC) has already issued a report with guidance to institutions on how to comply with federal higher education disclosure requirements and how to make the required information more accessible to consumers.<sup>16</sup> As part of a full complement of technical assistance to institutions, the Department should also consider releasing additional templates that institutions could voluntarily adopt to help them meet disclosure requirements.

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<sup>16</sup> The complete report is available at <http://nces.ed.gov/pubs2010/2010831rev.pdf>.

## Encourage Colleges to Disclose Comparable Data on Measures of Student Learning and Employment Outcomes

### *Findings*

Given the multiple missions of two-year colleges, federal graduation rates do not provide a comprehensive picture of the many positive outcomes students at two-year colleges are achieving. For example, students enroll in credit and non-credit courses to obtain skills or earn career and technical certificates that result in increased earnings or new career opportunities. Gathering information on the outcomes of these students is another important piece of the conversation about the impact of two-year colleges on student success.

To address this gap in national data, states, foundations, associations, and other organizations have initiated several efforts to collect data from two-year colleges on alternative measures of success, such as student learning and employment after college. The efforts have focused policymakers and colleges on alternative means for measuring success; however, there is not consistency in the way data are gathered and reported by each entity.

Recently released federal regulations have provided a framework for colleges to disclose comparable data on some employment outcomes. In October 2010 and June 2011, the Department issued regulations on improving the integrity of postsecondary programs that prepare students for gainful employment in a recognized occupation.<sup>17</sup> Programs subject to these new gainful employment regulations are: (a) certificate programs at any Title IV institution; and (b) all programs at for-profit institutions, except bachelor's degrees in liberal arts. The measures will be calculated for 55,405 programs at all types of institutions, with the vast majority of programs at public 2-year institutions. About 5,600 institutions have one or more programs subject to these regulations. The regulations released in June 2011 included two employment measures that will use Social Security earnings information in concert with student loan debt data from the Department of Education: (1) debt to earnings ratio and (2) repayment rates. While the measures disclosed under gainful employment regulations will provide useful information, the Social Security earnings data are limited to only those programs subject to the regulations. Additionally, institutions must disclose job placement rates for these programs using methods outlined by the Department.

While there is a foundation of data related to student employment outcomes, measures of student learning are not as well developed, and data are not as readily available. The challenges are due in part to the complexities and variations in methods for measuring student learning and that

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<sup>17</sup> 34 CFR 600, 34 CFR 602, 34 CFR 603, 34 CFR 668, 34 CFR 682, 34 CFR 685, 34 CFR 686, 34 CFR 690, 34 CFR 691.

## DRAFT FOR DISCUSSION ONLY

colleges are still identifying and developing assessments to measure student learning. The Department should provide incentives and convene representatives of two-year institutions to share promising practices on measuring and disclosing information about student learning.

### *Recommendations*

- 1. The Department should encourage institutions to voluntarily collect, disclose, and report through existing or new data collection vehicles results of measures of student learning and employment, including but not limited to those already being reported to accrediting agencies, state higher education agencies, or voluntary accountability initiatives.**

Institutions are already collecting data and measuring student learning and employment outcomes for a variety of entities—states, accreditation agencies, and others. While the data are not always collected in the same way, disclosing them publicly would allow consumers and policymakers to access more readily information about student success at two-year institutions.

The Department should aid institutions in developing measures of student learning and employment by offering technical assistance to colleges or providing incentives to report results publicly in a common format for ease of use and comparability. The Department should also convene representatives of the higher education community to highlight promising practices in the collection and dissemination of data related to student learning and employment at two-year institutions.

- 2. The Department should make available to the public data disclosed by institutions resulting from the gainful employment disclosure requirements.**

To ensure that data disclosed by institutions required under the gainful employment regulations are utilized by the public, the Department should make such data available to the public through a centralized, easily accessible website. In addition, since the regulations require institutions to disclose employment rates for certificate programs, the Department should also examine ways to use data collected under the gainful employment regulations to provide guidance on how institutions could disclose employment rates for associate's degree programs.

- 3. The Department should take actions that would enable two-year institutions to more readily access data needed to assess employment outcomes.**

To report data on students' employment following graduation or leaving the institution requires data that institutions may not collect or have the ability to obtain from current sources. The Committee recognizes the challenges that colleges face in gathering data on students' employment and earnings from multiple state and federal agencies, particularly the

## DRAFT FOR DISCUSSION ONLY

limitation of data sharing between agencies and concerns about protecting student privacy. To address these challenges, the Department should:

- a. Encourage states and institutions to develop more robust data systems that allow for collection and dissemination of a wider range of outcome measures for two-year institutions, especially given their workforce development missions;
- b. Provide increased guidance around student record and wage data matching while addressing requirements of the Family Educational Rights and Privacy Act (FERPA) to help institutions disclose employment rates for associate's degree programs; and
- c. Make the improvement of state data systems a priority through its State Longitudinal Data System grant program. Improvements could include making employment data easier to access and use and increasing capacity for interstate sharing of employment or unemployment insurance (UI) wage data.

### Improve Coordination of Data Related to Student Success

#### *Findings*

There are multiple sources of data for graduation rates and other measures of student success.<sup>18</sup> Although each adequately meets the specific purposes for which it was built, existing national and state databases together form a fragmented, incomplete picture of student success, particularly at two-year institutions.

An ideal framework for reporting student success data would require a comprehensive system that encompasses many more tracking points than what are currently required by states and by the Department. However, the Committee recognizes that such an ideal system would likely create additional burden to institutions. As has already been mentioned, one solution, creating a national privacy-protected student unit record system, holds potential to solve many of the issues associated with the incompleteness of data from various sources but is currently prohibited by HEOA. Other potential improvements to the completeness of data, such as revisiting the domain of the graduation rates required by SRK would also require legislative or regulatory changes.

The Committee strongly recommends that the Department continue to examine areas where improvements can be made in existing data systems. Where necessary, the Department should work with relevant stakeholders to develop the statutory, regulatory, and data infrastructures to

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<sup>18</sup> Cook, B. and Pullaro, N. (2010). *College Graduation Rates: Behind the Numbers*. Washington, DC: American Council on Education.

## DRAFT FOR DISCUSSION ONLY

create a comprehensive data system that protects student privacy and addresses the limitations of current data sources.

### *Recommendation:*

- 1. The Department should expand the data collection in the National Student Loan Data System (NSLDS) to improve reporting of student success for federal financial aid recipients.**

The Department has an existing database, the National Student Data System (NSLDS), in which information about enrollment and completion for student loan recipients currently exists. The Department should ensure that more comprehensive enrollment and completion data are collected for all Title IV aid recipients—including Pell grant recipients. This approach would minimize the amount of new data that an institution would need to report in IPEDS and would more accurately capture information about student success than is currently presumably done through institutional data collection.

## Conclusion

*[Content is forthcoming and will be included in the final report.]*